

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE**

TEAM KENNEDY,

Plaintiff,

vs.

**SHENNA BELLOWS, in her official
capacity as the Maine Secretary of State**

Defendant.

:

: **Civil Action #1:24-cv-00052**

: **Judge Woodcock**

:

: **First Declaration of**

: **Dianne Wilkins**

:

:

:

: *Filed Electronically*

FIRST DECLARATION OF DIANNE WILKINS

I, Dianne Wilkins, pursuant to 28 U.S.C. § 1746 declare under penalty of perjury as follows:

1. All statements in this Declaration are true to the best of my own personal knowledge or to the best of my information and belief, and if made on the basis of information I have obtained, I believe that information to be true.
2. I am over eighteen years of age and am mentally and physically able to provide truthful testimony in the above captioned matter.
3. I am a resident of the State of Maine.
4. I reside at 9 Lakeside Drive, Falmouth, Maine.
5. Robert F. Kennedy Jr. is an announced independent candidate for the Office of President of the United States.

6. I am a member of the ground campaign for Team Kennedy in Maine working to secure ballot access for Mr. Kennedy's slate of presidential electors to appear on Maine's 2024 general election ballot for the Office of President of the United States.

7. Since at least January, I have been working to organize the collection of signatures on petitions required to be used by Maine's Secretary of State to nominate Mr. Kennedy's slate of presidential electors.

8. In order to secure ballot access in the State of Maine, Team Kennedy must collect a minimum of 4,000 signatures on petitions nominating Mr. Kennedy's slate of presidential electors to appear on Maine's 2024 general election ballot.

9. However, Maine and the Secretary of State has prohibited Team Kennedy from collecting and filing more than 5,000 raw signatures in order to meet the minimum of 4,000 valid petition signatures.

10. Only registered voters may validly sign a petition to nominate Mr. Kennedy's slate of presidential electors.

11. As a result, to secure ballot access on Maine's 2024 general election ballot it is critical to only let registered voters sign the nomination petitions for Mr. Kennedy's slate of presidential electors.

12. When collecting ballot access petition signatures on the street or at other non-polling locations, I have no way of knowing if a person is an actual registered voter permitted to lawfully sign the nomination petition for Mr. Kennedy's slate of presidential electors.

13. While I can ask if a person is a registered, sometimes they provide answers which are not correct, as some people do not know if they are, in fact registered voters permitted to sign a ballot access petition.

14. It is only at the polling locations for the 2024 presidential primary election and the June primary election for all other candidates that I can be sure that the people I am asking to sign the ballot access petition for Mr. Kennedy's slate of presidential electors are actual registered voter permitted to provide a valid petition signature – because only registered voters are permitting to cast ballots inside the polling locations during the two primary elections conducted by Maine in 2024.

15. The best place to engage and communicate with a large number of individuals with the highest proportion of registered is at the polls during Maine's 2024 presidential and June primary elections.

16. Team Kennedy's strategy to collect 4,000 valid signatures out of the maximum number of 5,000 raw signatures permitted to be collected and filed with the Secretary of State, is to post our volunteer petition circulators, at different

polling locations at both of the primary elections conducted by Maine in 2024 -- the presidential primary election held on March 5, 2024 and the June primary election for all other political party candidates.

17. By manning different polls during both the 2024 presidential primary election and Maine's 2024 June primary election for all other candidates and offices, Team Kennedy can expand the total number of registered voters we can communicate with, and, hopefully, collect signatures from by a factor of 100%.

18. When working inside polling locations, I intend to only ask for signatures from voters who are in the process of leaving the polls.

19. I have been personally working to secure access to polling locations for Team Kennedy members to collect ballot access petition signatures during the 2024 presidential primary election. See, Exhibit A to this Declaration.

20. In order to be able to collect ballot access petitions inside polling locations, it is required to reach out, in advance, to the various town clerks to let them know that we would like to collect ballot access petition signatures and secure their permission.

21. Town clerks had initially communicated to me that since we were only collecting signatures for ballot access petitions, we would be permitted to collect petition signatures inside the polling locations during the 2024 presidential primary

election because such conduct was not considered electioneering. *See*, Exhibit A to this Declaration.

22. As of February 12, 2024, Scarborough's municipal clerk, Yolande Palmer Justice, initially confirmed that, because Team Kennedy was only collecting ballot access petitions, we would, in fact, be permitted to collect petition signatures inside the polling locations during Maine's 2024 presidential primary election. *See*, Exhibit A to this Declaration.

23. As of February 12, 2024, Windham's municipal clerk, Linda S. Morrill, initially confirmed that, because Team Kennedy was only collecting ballot access petitions, we would, in fact, be permitted to collect petition signatures inside the polling locations during Maine's 2024 presidential primary election. *See*, Exhibit A to this Declaration.

24. As of February 12, 2024, Wells' municipal clerk, Brenda Layman, initially confirmed that, because Team Kennedy was only collecting ballot access petitions, we would, in fact, be permitted to collect petition signatures inside the polling locations during Maine's 2024 presidential primary election. *See*, Exhibit A to this Declaration.

25. As of February 12, 2024, Saco's municipal clerk, Michele L. Hughes initially confirmed that, because Team Kennedy was only collecting ballot access petitions, we would, in fact, be permitted to collect petition signatures inside the

polling locations during Maine's 2024 presidential primary election. *See*, Exhibit A to this Declaration.

26. On February 13, 2024, Saco's municipal clerk reversed his decision to permit Team Kennedy to collect ballot access petition signatures inside Saco's polling location during Maine's 2024 presidential primary due to instructions from the Maine Secretary of State. *See*, Exhibit A to this Declaration.

27. As of February 9, 2024, I submitted all of the required paperwork to collect ballot access petition signatures at the Topsham polling location for the 2024 presidential primary election. *See*, Exhibit A to this Declaration.

28. On February 13, 2024, Topsham's municipal clerk emailed me revoking his consent to collect ballot access petition signatures for Mr. Kennedy's slate of presidential electors during the 2024 presidential primary election. *See*, Exhibit A to this Declaration.

29. As of February 9, 2024, Lewiston's municipal clerk, Kathleen M. Montgo initially confirmed that, because Team Kennedy was only collecting ballot access petitions, we would, in fact, be permitted to collect petition signatures inside the polling locations during Maine's 2024 presidential primary election. *See*, Exhibit A to this Declaration.

30. Then, suddenly, on or about February 13, 2024, all of the town clerks reversed their position reporting to me that the Secretary of State, on or about

February 12th has ordered them to prevent independent presidential candidates from collecting ballot access petition signatures during the 2024 presidential primary election. *See*, Exhibit A to this Declaration.

31. Mr. Kennedy's slate of presidential electors is not seeking the office of president of the United States.

32. Mr. Kennedy's slate of presidential electors is only seeking access to Maine's 2024 general election ballot to be elected to the electoral college so that they may secure the privilege to vote for, and elect, the next president of the United States.

33. None of the individuals who are members of Mr. Kennedy's slate of presidential electors are running for any office on Maine's 2024 presidential primary election.

34. None of the individuals who are members of Mr. Kennedy's slate of presidential electors will have their names printed on Maine's 2024 primary election ballot.

35. Further, declarant sayeth naught.

I, Dianne Wilkins, verify under penalty of perjury that the foregoing is true and correct.

Executed this 28 day of February, 2024



Dianne Wilkins

EXHIBIT A

WILKINS DECLARATION

Dianne Wilkins
 9 Lakeside Drive
 Falmouth, ME 04105
 dianne@kennedyme.com

Personal Notes: re: organizing petitioners for March 5, 2024 Maine Primary Elections

Chosen Towns & Reasons to Staff Election Polling Locations:

All of these towns have a Single Polling Location so numbers are true for entire town

Primary Election Town	County	Address	Town Clerk Phone	Time of Polls	Poll #s for Venue
Windham	Cumberland	406 Gray Road	Windham H.S. BIG GYM	6:30am	Poll #s D=4253, R=4024, Indep=3953
Scarborough	Cumberland	11 Municipal Drive	Scarborough H.S.	6:30am	Poll # D=6838, R=4462, Indep=3142
Wells	York	1470 Post Road	Wells Junior High Gym...	7:45am	Poll # D=3168 R=2463, Indep=3348
Saco	York	438 Main Street	Thornton Academy	6:30am	Poll #s D=6130, R=3337, Indep=3962
Topsham	Sagadahoc (Midcoast)	68 Eagles Way	Mt Ararat H.S. Gym	7:45am	Poll #s D=2927, R=1884, Indep=2261
Bangor	Penobscot (Northern)	515 Main Street	Cross Insurance Center Arena	6:30am	Poll # D=7428, R=5046, Indep=5206
Lewiston	Androscoggen (Central)	145 Birch Street	Longley School	6:30am	Poll # D=4437, R=1894, Indep=2029

Contact & Specific local poll requirements for Chosen Towns regarding staffing petitioners at their poll:

<p>Scarborough</p> <p>Petitioner Shifts: 6:45 - 10:45am 3-7:30pm</p>	<p>Municipal Clerk</p> <p>Yolande Palmer Justice 259 US Rte 1 PO Box 360 Scarborough, ME 04070 Phone: (207) 730-4020 Fax: (207) 730-4033</p> <p>Municipal Registrar</p> <p>Same as Clerk</p>	<ul style="list-style-type: none"> • Confirmed with town Clerk (2-12-24) • 6:45am shift start • 2 petitioners per shift • can have sign to hang off the table! • I gave my name as the contact person/phone/email • So need 2 petitioners for the 6:45-10am shift and 2 people for 3-7 shift! <p>Notary Public Rosemarie De Angelis \$120 check/cash will meet petitioners at Starbucks after both shifts</p> <p>OR</p> <p>Notary: 9-4pm \$ UPS 201 Us Rt 1 (only from 9-4pm walk-ins only) \$12.50 per document need checks/cash and no appointments Phone: (207) 883-9087 store3781@theuppsstore.com</p>
<p>Windham</p> <p>Petitioner Shifts: 6:45 - 10:45am 3-7:30pm</p>	<p>Linda S. Morrell, Municipal Clerk 8 School Rd Windham, ME 04062 Phone: (207) 892-1900 Fax: (207) 892-1914</p>	<ul style="list-style-type: none"> • Confirmed with town Clerk (2-12-24) • 6:45am shift start at Big Gym • 2 petitioners per shift • can have sign to hang off the table! • Need to bring table & chair

	Judith H. Vance, Municipal Registrar 8 School Rd Windham, ME 04062 (207) 892-1900 (207) 892-1914	<ul style="list-style-type: none">• So need 2 petitioners for the 6:45-10am shift and 2 people for 3-7 shift! Notary: <ul style="list-style-type: none">• \$ UPS: 824 Roosevelt Trail Phone \$10 per doc: (207) 892-6024 store0629@theupsstore.com OR <ul style="list-style-type: none">• Town Office 8 Schools is OPEN on Primary from 7am to 6pm, \$5 per doc, don't have to be resident!! Town Clerk at town hall, 8 School Street, open till 7pm on Tuesdays "offer free Notary services to residents and non-residents (\$5 fee per seal), need valid ID. Appointments are not necessary.
Bangor 6:45am - 10:30 3pm-7pm NEED TABLE	Municipal Clerk Lisa J. Goodwin 73 Harlow Street Bangor, ME 04401 Phone: (207) 992-4200 Fax: (207) 945-4449 Municipal Registrar Same as Clerk	<ul style="list-style-type: none">• called Friday 2-9-24 spoke to clerk Lisa Goodwin will get back to me (claims to need to ask SOS),• also spoke to Brandon on Monday 2-12-24 and said will email me with any special instructions but still has not done so:• <u>Bangor Clerk emailed 2-13-24 to say SOS won't allow us to petition at the poll</u> Notary: <ul style="list-style-type: none">• \$ UPS 499 Broadway, Bangor 207-947-9999 Notary 10am-4pm, \$8 per doc Meet-up at Dunkins 327 Main Street, Bangor

Wells:

1470 Post Road Wells Junior High Gym

7:45am - 11:45
3pm-7pm**NEED TABLE**

Brenda Layman, Municipal Clerk

208 Sanford Rd

Wells, ME 04090

Phone: (207) 646-2882

Fax: (207) 361-1096

Kerri Van Schack, Municipal Registrar

208 Sanford Rd

Wells, ME 04090

(207) 646-2882

(207) 361-1096

- Confirmed with town Clerk (2-12-24)
- Bring table 3x3ft & chair
- 7:45am shift start
- 2 people per shift
- can have sign

Notary: \$200 check Carrie Tracy
207-468-2965 or \$100 for just the 2nd
shift.... meet at Dunkins (45 Portland Road)
base

OR:

CALL Check Christine DeAngelis

[Finance Department](#)

Title: Assistant Tax Collector/ BMW

Phone: 207-646-5113

Additional Phone: 207-361-8875

[Email](#)**Saco:** 438 Main Street, Thornton Academy6:45am - 10:30
3pm-7pm**NEED TABLE**

Municipal Clerk

Michele L. Hughes

300 Main Street

Saco, ME 04072

Phone: (207) 284-4831

Fax: (207) 282-8202

Municipal Registrar, Same as Clerk

- Confirmed with town Clerk (2-12-24)
- **Called me to revoke permission**
- **2-13-24 due to SOS**
- 6:30-6:45 start
- 2 people per shift
- Bring table & chair
- Can have sign

Notary:

\$200 check Carrie Tracy 207-468-2965 or
\$100 for just the 2nd shift.... meet at
Dunkins (24 Maine Turnpike Southbound

		<p>closes at 8 Portland Road) base</p> <p>\$UPS: 4 Scamman St Ste 19: \$10 per sig but only notary at 10am-3pm (takes walk-ins, no appoints wait time up to 30minutes) Phone: (207) 282-1011 store0591@theupsstore.com</p> <p>Or try (603) 496-8831) Chickadee 207-370-0020 Laura@ChickadeeNotary.com</p>
<p>Topsham 7:45-11:45am 3-7pm</p> <p>NEED TABLE</p>	<p>Municipal Clerk</p> <p>Linda Jean Dumont 100 Main Street Topsham, ME 04086 Phone: (207) 725-5821 Fax: (207) 725-1733</p> <p>Municipal Registrar</p> <p>Same as Clerk</p>	<ul style="list-style-type: none"> Spoke to Clerk and Filled out town's required req form sent to via email to Clerk (2/9/24) Clerk emailed to confirm 2-12-24 <u>Topsham Clerk emailed 2-13-24 to revoke consent & say SOS won't allow us there</u> <p>Notary: \$UPS call to confirm: \$12, 9-4PM 135 Maine St Ste A Brunswick, ME 04011 Phone: (207) 729-9891 store3338@theupsstore.com</p>
<p>Lewiston: 145 Birch Street, Longley School Gym</p> <p>Shifts 6:45am -10:30 3-7pm</p>	<p>Municipal Clerk</p> <p>Kathleen M. Montejo 27 Pine Street Lewiston, ME 04240 Phone: (207) 513-3124 Fax: (207) 777-4621</p> <p>Municipal Registrar - Same as Clerk</p>	<ul style="list-style-type: none"> Confirmed with town Clerk (2-9-24) 6:30-6:45am first come first served, arrive and go inside to table set-up in the Hallway leading up to the Gym Has tables set-up already Can hang our Sign from table Must only try to catch Only those who are coming out of voting room to sign the petition Must call to confirm open on Primary Day?

- The City Clerk's Office also provides **notary public** services for **Lewiston** residents who have proper identification in the form of a valid government issued photo ID

NOTE: We will have to contact each polling location to see if they require a list of petitioners/times/what petition for as it could be different...see email dated Jan 12, 2024 from Laura to Ashley Rand (arand2portlandmaine.gov): Ashley Rand states:

"If Candidate *is not* going to appear on the March ballot, you can set-up a petitioner at each polling location to collect signatures. Depending on the space, some have to be inside (as voters exist) and some are outside of the building. Due to space please only send one petitioner to each polling location. We need a list of the petitioners names, which polling locations they will be at, the times they will be there, and what the petition is for"

Information from most recent registered & enrolled voters at Polling locations statewide as of 1/27/23

(<https://www.maine.gov/sos/cec/elec/data/data-pdf/r-e-active.pdf>)

Municipalities & Reasons these were Not Chosen for us to staff petitioners:

Portland: *Too many poll locations to cover and unproductive polls as compared to these others single polls (less bang for buck) and/or very large number of D's as compared to less R/less indep

Sanford: 2 polls to staff to get same effect of just one of the chosen

Sanford	York	Poll # D=1367, R=1297, Indep=1408
Sanford	York	Poll # D=1453, R=1169, Indp=1488

Belfast:

Belfast	Waldo	Poll #s D=2338, R=780, Indep=840
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Brunswick: *same reason

Augusta: *same reason

Farmington: *same reason

Bridgeton: *same reason

Yarmouth: *same reason

Cape E: *same reason

Lisbon: not sure if worth the effort

Lisbon	Androscoggen	Poll # D=1686, R=2058, <i>Indep=1932</i>
Biddeford: although is a single poll location there are lots of D's less Rs and 1/2 #indep (this one questionable)		
Biddeford	York	Poll #s D=6642, R=2480, <i>Indep=3453</i>